



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF TRANSPORTATION

1401 EAST BROAD STREET  
RICHMOND, VIRGINIA 23219-2000

PHILIP A. SHUCET  
COMMISSIONER

August 4, 2004

EARL T. ROBB  
STATE ENVIRONMENTAL ADMINISTRATOR

Mr. Roberto Fonseca-Martinez  
Federal Highway Administration  
Post Office Box 10249  
Richmond, Virginia 23240-0249

Re: Project Level Air Quality Studies Agreement

Dear Mr. Fonseca-Martinez:

In an effort to streamline project level air quality studies, the Virginia Department of Transportation (VDOT) would like to update our current agreement with the Federal Highway Administration. Currently, VDOT is following the procedures outlined in a FHWA letter dated August 22, 2000. Based on an extensive review of previous projects and additional analysis using MOBILE6.2, we recommend the following procedures to further streamline the project level air quality analysis:

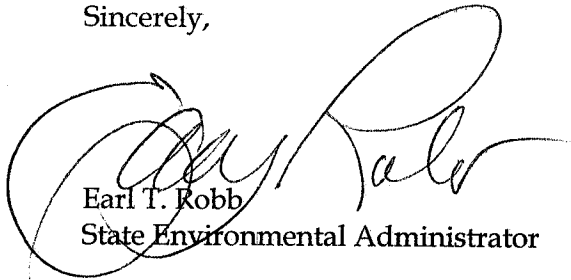
- A. Projects that qualify for Programmatic Categorical Exclusions do not require project level carbon monoxide air quality analysis
- B. A qualitative carbon monoxide (CO) analysis, represented by a uniform statement, (see attachment 1) will be included in the Categorical Exclusion or Environmental Assessment for projects meeting one of the following criteria:
  - 1. Any project identified as being exempt in 40 CFR 93.126;
  - 2. Any project which meets the following design year level of service (LOS) requirements:
    - i. Level of Service (LOS) is "C" or better for all intersections/interchanges in the project area or intersections/interchanges directly affected by the project (40 CFR 93.123)
  - 3. Any project which meets the following traffic volume requirements:
    - (i) The design year 24-hour forecasted traffic does not exceed 30,000 vehicles per day if one or more intersections/interchanges has LOS "D" or worse;
    - (ii) The design year 24-hour forecasted traffic on any roadway in the project area or any road directly affected by the project does not exceed 42,500 vehicles per day;

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- C. A quantitative CO analysis will be required on projects meeting one or more of the following criteria:
  - 1. Any project that does not meet any of the criteria under paragraph A or B above; or
  - 2. Any project for which an Environmental Impact Statement is prepared;
- D. For projects requiring a quantitative analysis, the following quantitative CO analysis will be conducted:
  - 1. CAL3QHC/MOBILE6.2 for all projects, which consist of a section of road with an intersection or interchange;
  - 2. CAL3QHC or CALINE3/MOBILE6.2 for all projects, which consist of a section of road with no intersections.

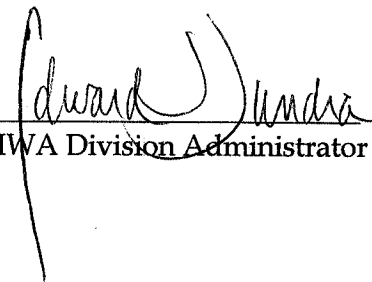
This letter represents a newly revised agreement and once approved, replaces the agreement currently in place, but will not alter previously granted approvals or apply to projects for which an environmental document is already underway.

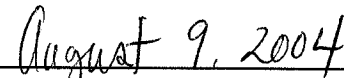
Sincerely,



Earl T. Robb  
State Environmental Administrator

We concur with these procedures to streamline the project level air quality studies.

for:   
FHWA Division Administrator

  
Date

**Qualitative Project Level Air Quality Statements  
for Virginia Department of Transportation Projects**

***Exempt Project***

According to 40 CFR 93.126 (Table 2 Exempt Projects), the project is identified as being exempt from an air quality analysis. Since the project is exempt from an air quality analysis, it can be concluded that the project will not significantly impact air quality nor will it cause or contribute to an exceedance of the National Ambient Air Quality Standard for carbon monoxide.

***LOS Criteria***

All of the intersections/interchanges in the project area or directly affected by the project are forecasted to operate at a Level of Service (LOS) of "C" or better in the design year. According to 40 CFR 93.123, only a qualitative analysis must be conducted for this project, therefore, it can be reasonably concluded that this project will not significantly impact air quality nor will it cause or contribute to an exceedance of the National Ambient Air Quality Standard for carbon monoxide.

***Traffic Volume***

The project does not include or directly affect any roadway whose design year daily traffic volume would exceed the traffic thresholds outlined in the Memorandum of Understanding (MOU) between the Virginia Department of Transportation and Federal Highway Administration for streamlining the project-level air quality analysis process. Modeling using "worst" case parameters has been conducted for these thresholds and it has been determined that projects below these thresholds, such as this one, would not significantly impact air quality nor will it cause or contribute to an exceedance of the National Ambient Air Quality Standard for carbon monoxide.